

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: GREGG STEPHEN JURIS and	:	CHAPTER 13
MARYANNE MONICA JURIS f/k/a	:	
MARYANNE MONICA KANE	:	
Debtors	:	
	:	
GREGG STEPHEN JURIS and	:	
MARYANNE MONICA JURIS f/k/a	:	
MARYANNE MONICA KANE	:	
Movants	:	
	:	
vs.	:	
	:	
PENNYMAC LOAN SERVICES, LLC	:	
AND CHARLES J. DEHART, III,	:	
ESQUIRE, STANDING CHAPTER 13	:	
TRUSTEE	:	
Respondents	:	CASE NO. 1-18-bk-01323-HWV

TRUSTEE'S OBJECTION TO AMENDED MOTION FOR SALE OF
PROPERTY FREE AND CLEAR OF LIENS

AND NOW, this 8th day of January, 2021, comes Charles J. DeHart, III,
Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney,
James K. Jones, and objects to Debtor's Amended Motion for Sale of Property Free and Clear of
liens for the following reasons:

1. Objectant, Charles J. DeHart, III, is the duly appointed Trustee for this case.
2. Trustee does not object to the terms of the sale.
3. Trustee objects to the disbursement of the sale proceeds for the following reasons:
 - a. Debtors' attorney is paid \$1,500.00 from the sale without prior approval from the Court to determine whether these fees are reasonable compensation for services rendered.
 - b. Trustee prefers that such fees are escrowed by debtors' attorney pending the approval of a Fee Application and that any excess fees be paid into the plan for unsecured claims.

- c. Non-exempt proceeds from the sale of the real estate should be paid to the Trustee for distribution to unsecured claims.

WHEREFORE, your Trustee respectfully requests this Honorable Court to deny debtors' Amended Motion for the Sale of Property Free and Clear of Liens so long as the motion provides for the objected to provisions.

Respectfully submitted,

Charles J. Dehart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/James K. Jones
Attorney for Trustee
jjones@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 8th day of January, 2021, I hereby certify that I have served the within Objection electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Paul Murphy-Ahles, Esquire
2132 Market Street
Camp Hill, PA 17011

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee